

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA

CLERK'S OFFICE U.S. DIST. COURT
AT ABINGDON, VA
FILED

NOV 22 2021

JULIA C. DUDLEY, CLERK
BY: *a. Meade*
DEPUTY CLERK

MELINDA SCOTT,)

)

PLAINTIFF.)

)

V.)

CL NO. 2:20cv14

)

WISE CO. DSS,)

ET AL.,)

)

DEFENDANTS.)

MOTION FOR INJUNCTION

COMES NOW, the Plaintiff, in accordance with Rule 5.2(e)(2) and files this Motion for an Injunction against Defendant Moon and third parties who frequent his website, KiwiFarms.net.

FACTS

1. Joshua Moon is the owner of KiwiFarms.net. He has admitted he is in the owner and records keeper of the site in a signed Declarations before this court (docket #91-1)
2. Part of the mission of KiwiFarms.net is to "doxx" random targets by posting publicly for an international audience private information about their targets. In order to doxx" targets the Joshua Moon and his anonymous users post the residential address, place of employment,

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place of educational attendance, make and model of vehicles, license plate information, whereabouts of their minor children, identifiers of their minor children (like county of residence, gender, names, ages etc), and residential information of minor children, etc. They have absolutely no limit or boundaries for what they post.

3. Joshua Moon who is the creator and owner of KiwiFarms.net has created "doxxing" a goal of his website with actual malice. The purpose of the "doxxing" is to inflict harm and distress onto the targets. He uses other people who hide under anonymous profiles to do his "dirty work" to post information and harass targets (see docket #43 exhibits). It is also not unreasonable to assume that he also hides behind anonymous profiles to do the same.
4. The users of KiwiFarms.net have engaged in a pattern of Cyberstalking of Plaintiff Scott by way of "doxxing" between March 13, 2017 and the present date.
5. Previously, Plaintiff Scott, asked the Western District Court of Virginia to seal her residential address when filing. The clerk of the district court scanned her request, which included her residential address, publicly onto Pacer.gov (See *Scott v Carlson*). The document was then posted on Kiwi Farms.
6. Previously, Plaintiff Scott asked the Western District Court of Virginia to seal the name of her minor children and residential address listed on a Protective Order. A magistrate judge refused to seal it and it was exposed publicly onto KiwiFarms.net (see *Scott v Moon et al*). The document was then uploaded to KiwiFarms.net
7. Anonymous users of KiwiFarms.net have posted unredacted copies of Exhibit #99-3 on KiwiFarms.net. Plaintiff has attached Exhibits demonstrating this.

8. Anonymous users of KiwiFarms.net have threatened to continue to use court documents to post personally identifying information onto KiwiFarms.net and other websites. Plaintiff has attached Exhibits demonstrating this.
9. Although court documents can be extracted from requests of the clerk, the clerk of any court has the legal right to use discretion to deny a request that looks like it may be used for criminal purposes, such as Cyberstalking. Defendant Moon's belief that clerks just pass out documents like candy is erroneous.
10. Plaintiff Scott is working on asking every clerk of every district court and circuit court to seal her records because prior to the existence of KiwiFarms.net, she had no reason to do otherwise. However, this is a process that takes time.
11. Between March 13, 2017 and the present date, users of Appellee Moon's website KiwiFarms.net have engaged in Cyberstalking behaviors, including but not limited to: (a) tracking the Appellant's residential information¹ (b) tracking the Appellant's county of residence² (c) tracking the Appellant's whereabouts³ (d) sharing information from their findings of bullets (a) through (c) for an international audience by posting it on the website KiwiFarms.net, (d) sent the Appellant harassing emails saying they intended to use her residential information to exploit and harm her (see ECF/district court docket #43, Exhibit A), (e) made death threats to the Appellant (ECF/district court docket #43, exhibit B) (f) made threats to do bodily injury to the Appellant⁴ (g) made threats to do bodily injury to her children⁵ and (h) made threats to stalk her children through "doxxing" and otherwise⁶ (also docket #43, exhibit A).

¹ <https://kiwifarms.net/threads/melinda-leigh-scott-marshall-castersen.32118/post-6902180>

² <https://kiwifarms.net/threads/melinda-leigh-scott-marshall-castersen.32118/post-10233989>

³ <https://kiwifarms.net/threads/2018-12-12-melinda-leigh-scott-v-andrew-carlson-joshua-moon-sherod-degrippo.50975/post-4097481>

⁴ <https://kiwifarms.net/threads/melinda-leigh-scott-marshall-castersen.32118/post-6005455>

⁵ <https://kiwifarms.net/threads/melinda-leigh-scott-marshall-castersen.32118/post-6939700>

⁶ <https://kiwifarms.net/threads/melinda-leigh-scott-marshall-castersen.32118/post-10278703>

12. Before owning KiwiFarms.net, Joshua Moon previously helped create a website called “8Chan”⁷, known for its “Extremist Hate”. “8Chan” was shut down by a host company called “Cloudfare” because of mass shootings orchestrated by its users⁸. When that site was shut down, the gang of socially deviant criminals and stalkers of 8Chan followed Joshua Moon over to KiwiFarms.net. KiwiFarms.net became the replacement for 8Chan. It is the new place where his users are encouraged by Joshua Moon to engage in malicious behavior against their victims.
13. Joshua Moon helped develop “8Chan” and then later created “16Chan”⁹. Both sites were for extremist hate groups that also promoted child pedophilia¹⁰. “*The Daily Dot* wrote that the 4Chan and 8Chan boards existed to share sexualized images of minors in provocative poses, and that some users of those boards post links to explicit child pornography hosted elsewhere”¹¹. When 8Chan was removed by Cloudfare, 16Chan became one of its replacements. KiwiFarms.net have also posted cartoon images of young children being sodomized on the site.
14. One can only be cautious then in wondering why Joshua Moon and his website users who were involved in these “Chan” sites are fixated on getting access to records relating to the Plaintiff’s minor children. This court should not turn a blind eye to Joshua Moon’s past history of promoting child pedophilia on websites which he helped create and also owned.

⁷ https://wiki.bibanon.org/8chan_Chronicle

⁸

<https://www.usatoday.com/story/news/nation/2019/08/04/8-chan-third-mass-shooting-2019-linked-webs-dark-est-reaches/1917135001/>

⁹ <http://archive.md/ZiCuS>; <http://matthewhopkinsnews.com/?p=4135>

¹⁰ https://rationalwiki.org/wiki/Online_pedophile_activism#8chan

¹¹ <https://www.dailydot.com/tags/pedophilia/page/7/>;

<https://www.dailydot.com/debug/8chan-pedophiles-child-porn-gamergate/>

REQUEST TO THE COURT

The Plaintiff hereby motions this court to grant her Motion for Injunction against Joshua Moon to order Defendant Joshua Moon to remove the following from his website, KiwiFarms.net, and any subsets of KiwiFarms.net, including KiwiFarms.net archives and international sites, and any other site he may own in the future:

1. Any and all court documents, or documents otherwise, posted on KiwiFarms.net between March 13, 2017 and the date of the order containing (1) the Plaintiff and her minor children's residential address, (2) the Plaintiff and her children's county of residence, (3) the Plaintiff's places of employment or business (4) the Plaintiff's place of attendance at any graduate school (5) the Plaintiff's make, model, year of vehicles (6) her children's whereabouts and (7) any other identifying information such as social security numbers, etc
2. Any and all text comments or images containing information from court documents or documents otherwise, posted on KiwiFarms.net between March 13, 2017 and the date of the order containing (1) the Plaintiff and her minor children's residential address, (2) the Plaintiff and her children's county of residence, (3) the Plaintiff's places of employment or business (4) the Plaintiff's place of attendance at any graduate school (5) the Plaintiff's make, model, year of vehicles (6) her children's whereabouts and (7) any other identifying information such as social security numbers, etc
3. An order preventing Joshua Moon from being permitted to post any of the information described in bullet 1 and 2 from the date of the order and into all dates into the future.

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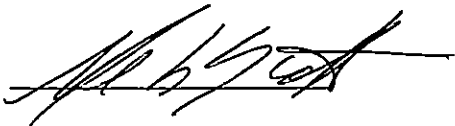
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Further, Plaintiff Scott requests that this court grant an Injunction preventing any third party from posting online:

4. Any court documents, general document, text, image, or otherwise anywhere online, KiwiFarms.net, or otherwise, any information that contains: (1) the Plaintiff and her minor children's residential address, (2) the Plaintiff and her children's county of residence, (3) the Plaintiff's places of employment or business (4) the Plaintiff's place of attendance at any graduate school (5) the Plaintiff's make, model, year of vehicles (6) her children's

I ASK FOR THIS,

A handwritten signature in black ink, appearing to read 'Melinda Scott', with a horizontal line drawn through the middle of the signature.

Melinda Scott, *pro-se*

PO BOX 1133-2014PMB87 (VA ACP address)

Richmond, VA 23218

540-692-2342

mscottw@gmu.edu

CERTIFICATE OF SERVICE

I certify that I have mailed a copy of this MOTION FOR INJUNCTION to Counsel for the Defendant, Matthew D. Hardin, VSB #87482, 1725 I Street NW, Suite 300, Washington, D.C., 20006, and at matthewdhardin@gmail.com on this 19th day of NOV., 2021.

SIGNED,

A handwritten signature in black ink, appearing to read 'Melinda Scott', is written over a horizontal line.

Melinda Scott, *pro-se*

PO BOX 1133-2014PMB87 (VA ACP address)

Richmond, VA 23218

540-692-2342

msscottw@gmu.edu